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10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12 13	SAN JOSE DIVISION		
13			
15	ANGEL FRALEY; PAUL WANG; SUSAN MAINZER; JAMES H. DUVAL, a minor, by	Case No. 11-CV-01726 LHK (PSG)	
16	and through JAMES DUVAL, as Guardian ad Litem; and W.T., a minor, by and through	DECLARATION OF CHRISTOPHER	
17	RUSSELL TAIT, as guardian ad Litem; individually and on behalf of all others similarly situated,	PLAMBECK IN SUPPORT OF FACEBOOK, INC.'S OPPOSITION TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	
18	Plaintiffs,	Date: May 24, 2012	
19	V.	Time: 1:30 p.m. Courtroom: 4	
20	FACEBOOK, INC, a corporation; and DOES	Judge: Hon. Lucy H. Koh Trial date: December 3, 2012	
21	1-100,	[PUBLIC REDACTED	
22 23	Defendants.	VERSION]	
24			
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28			
P		DECL. OF CHRISTOPHER PLAMBECK I/S/O	

COOLEY LLP ATTORNEYS AT LAW SAN FRANCISCO DECL. OF CHRISTOPHER PLAMBECK I/S/O OPP. TO PLAINTIFFS' MOT. CLASS CERTIFICATION CASE NO. 11-CV-01726

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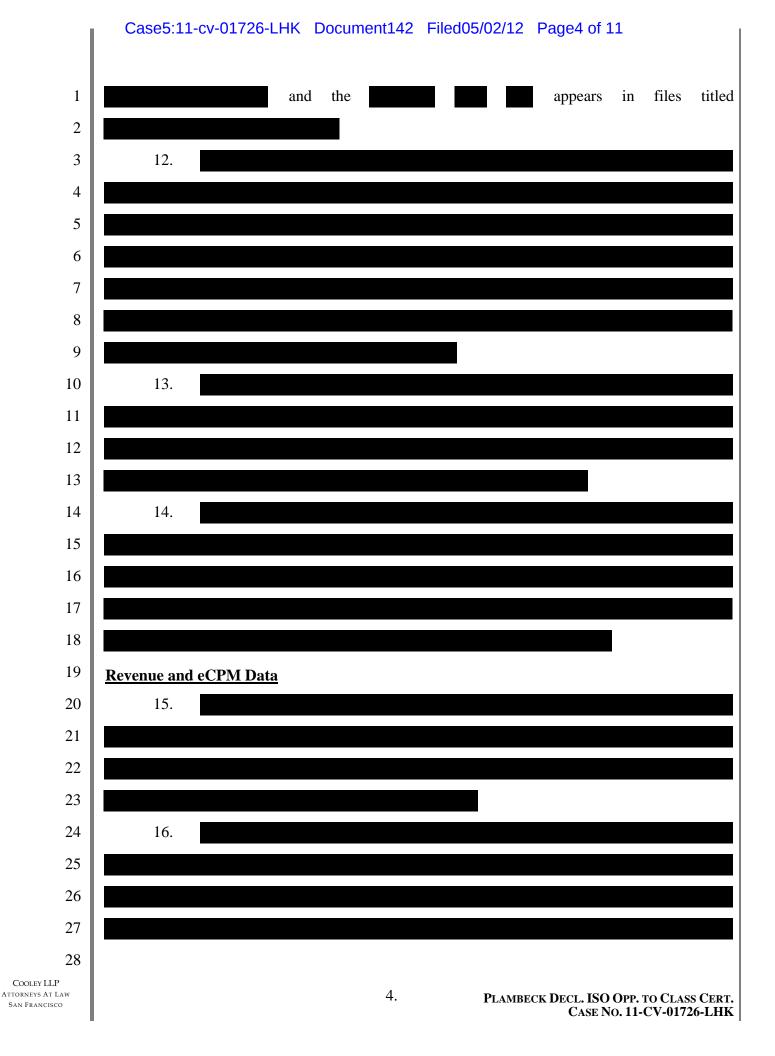
I, Christopher Plambeck, hereby declare as follows:

- I am employed as Director, Monetization Analytics, for Defendant Facebook, Inc. ("Facebook"). I have been employed by Facebook for more than two years. In my current role, I manage a team responsible for supporting various business functions, including partnering with product and engineering teams to provide data insights about Facebook's business strategy and products. Based on my overall experience working for Facebook, I also have general knowledge of the functioning and layout of the Facebook website, certain of the data that Facebook maintains, and Facebook's marketing products, including Sponsored Stories. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would competently testify thereto.
- 2. Facebook logs and maintains certain data in order to operate and analyze the functioning and performance of the Facebook website. Much of this data is generated by Facebook's 845 million users ("Users"), who upload and share content—status updates, profiles, photographs, videos, comments, messages, and more—all of which Facebook stores for the use of its Users. Facebook's Users currently generate an average of 2.7 billion "Likes" and comments each day, and Facebook currently stores more than 100 petabytes (100,000 terabytes or 100 quadrillion bytes) of photos and videos.
- 3. The statements that follow are based on my review of the data that Facebook maintains in the ordinary course of its business, and, in some instances, the queries performed of that data.

Name, Profile Picture, and Birthdate Changes

- 4. Facebook requires Users to enter their name in their basic profile information. Facebook also requires Users to submit their birthdates, although such birthdates do not need to be shared publicly. Facebook also gives Users the ability to upload and select profile pictures, which Users may change at any time. A Profile picture is not required to be an actual image of the User, and some Users do not use photos of themselves as their profile pictures.
- 5. To the best of my knowledge, Facebook has no practical ability to verify whether (i) each User has supplied his or her legal name, or a derivative thereof, or whether the provided

1	name otherwise bears any relation to the User's actual name; (ii) each User's reported birthdate is		
2	the User's real birthdate; or (iii) each User's profile picture contains his or her likeness.		
3	6. Facebook's records indicate that Users who Facebook can		
4	reasonably ascertain were located in the United States on December 31, 2011, changed their		
5	Facebook usernames at least once between January 1, 2011 and December 31, 2011.		
6	7. Facebook's records indicate that more than who Facebook can		
7	reasonably ascertain were located in the United States on December 31, 2011, changed their		
8	birthdates (and thus their ages) at least once between January 1, 2011 and December 31, 2011.		
9	8. Facebook's records indicate that more than who Facebook can		
10	reasonably ascertain were located in the United States on December 31, 2011, changed their		
11	profile pictures at least once between January 1, 2011 and December 31, 2011.		
12	9. Facebook's records indicate that, as of January 25, 2011, there were approximately		
13	145.5 million Users who Facebook can reasonably ascertain were located in the United States. Of		
14	these Users, approximately appeared to be under the age of 18, based on User-		
15	supplied birthdates.		
16	Impression and Click Data		
17	10. I am aware that Facebook has exported data that shows		
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19			
20	I am advised that this exported data (with appropriate redactions to anonymize		
21	other Users' identities) was produced in the litigation with Bates number FB_FRA_1024.		
22	11. I am aware that Facebook also has exported data from November and December		
23	2011 that shows		
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26	(with appropriate redactions to		
27	anonymize other Users' identities) appears in files titled and		
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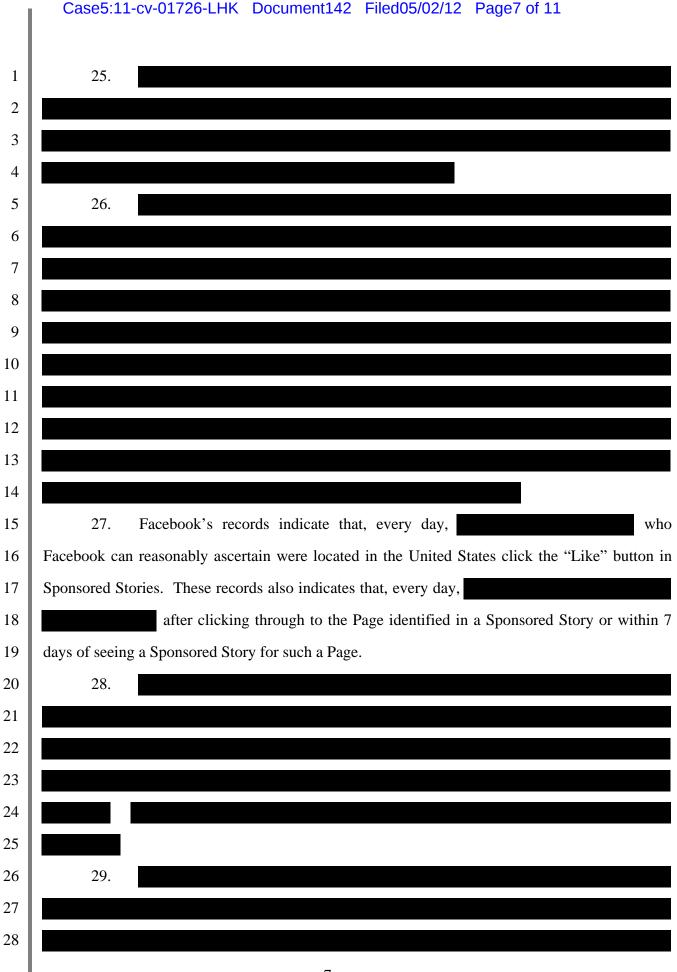


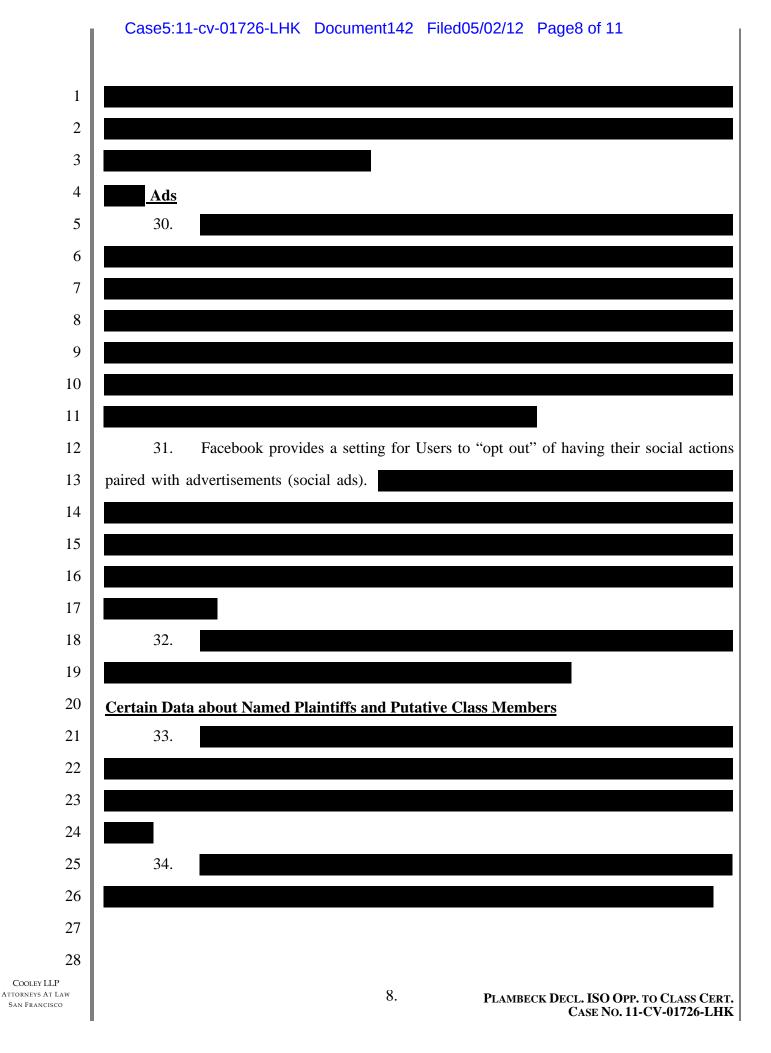
1 2 3 17. 4 5 6 7 8 9 **User Visits to Terms and Help Center Pages** 10 18. Based on sampled data, Facebook's who Facebook can reasonably ascertain were located in the United States visited 11 the webpage with Facebook's terms, located at http://www.facebook.com/legal/terms, between 12 13 14 15 16 17 18 19 19. Facebook's records indicate that, between 20 the following number of Users who Facebook can reasonably ascertain were located in the United 21 States visited the specified pages in the Facebook Help Center: visited 22 the "Interacting with Ads Sponsored and Stories" webpage, located at 23 https://www.facebook.com/help/?page=226611954016283; and visited Stories" 24 the "Sponsored located webpage, at 25 https://www.facebook.com/help/?page=213208552035450. 26 20. Facebook's records indicate that, 27 28 in response to the question of whether the information on the "Interacting with

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1 Ads and Sponsored Stories" webpage, located at 2 https://www.facebook.com/help/?page=226611954016283, was helpful; and (ii) approximately 3 in response to the question of whether the information on the "Sponsored Stories" webpage, located at 4 5 https://www.facebook.com/help/?page=213208552035450, was helpful. 6 Friend Data 7 21. Facebook allows—but does not require—Users to indicate if they are related to 8 other Facebook Users. 9 10 11 To the best of my knowledge, Facebook has no practical 12 method of verifying whether the indicated parent-child relationship is accurate. 13 Page "Like" and "Unlike" Data 14 22. Through privacy settings, Facebook allows Users to specify whether certain 15 categories of their Facebook Page Likes will be shown publicly, only to their Friends, to a custom 16 group of Friends, or to "Only Me." The "Only Me" setting means that a User's Page Likes are 17 visible only to the User him/herself. 18 23. 19 20 21 22 24. 23 24 25 26 27 28

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Case5:11-cv-01726-LHK Document142 Filed05/02/12 Page9 of 11 **Additional Data Exports** 35. 36. 37. 38. 39. COOLEY LLP 9. PLAMBECK DECL. ISO OPP. TO CLASS CERT. CASE NO. 11-CV-01726-LHK ATTORNEYS AT LAW SAN FRANCISCO

Case5:11-cv-01726-LHK Document142 Filed05/02/12 Page10 of 11 40. 41. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 19, 2012 at Menlo Park, California. /s/ Christopher Plambeck_ Christopher Plambeck 10. PLAMBECK DECL. ISO OPP. TO CLASS CERT.

1	GENERAL ORDER 45 ATTESTATION	
2	In accordance with General Order 45, concurrence in the filing of this document has been	
3	obtained from the signatory and I shall maintain records to support this concurrence for	
4	subsequent production for the Court if so ordered or for inspection upon request by a party.	
5	Dated: April 19, 2012	COOLEY LLP
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7		/s/ Michael G. Rhodes Michael G. Rhodes
8		Attorneys for Plaintiff
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